

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re

GENERAL MOTORS CORPORATION, et al.,

Debtors.

Chapter 11

Case No. 09-50026 (REG)

Jointly Administered

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**REQUEST FOR SPECIAL NOTICE PURSUANT TO BANKRUPTCY RULES 2002(a)  
AND (b) AND PLEADINGS PURSUANT TO BANKRUPTCY RULE 3017(a)**

PLEASE TAKE NOTICE that Oracle USA, Inc. ("Oracle") and Oracle Credit Corporation hereby request that all notices given or required to be given in the above-captioned case, and all papers served or required to be served in this bankruptcy proceeding including, without limitation, all notices pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017 and 9007, be given and served upon:

Shawn M. Christianson, Esq.  
Buchalter Nemer, A Professional Corporation  
333 Market Street, 25th Floor  
San Francisco, California 94105-2126  
Telephone: (415) 227-0900  
Facsimile: (415) 227-0770  
schristianson@buchalter.com

Neither this Request for Special Notice nor any subsequent appearance, pleading, claim or suit is intended or shall be deemed to waive Oracle's and/or Oracle Credit Corporation's: (i) right(s) to have final orders in non-core matters entered only after de novo review by a district judge; (ii) right(s) to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right(s) to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other

rights, claims, actions, defenses, setoffs or recoupments to which Oracle and Oracle Credit Corporation are, or may be, entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are reserved.

BUCHALTER NEMER,  
A Professional Corporation

Dated: June 17, 2009

By: /s/ Shawn M. Christianson  
Shawn M. Christianson, Esq.  
333 Market Street, 25th Floor  
San Francisco, CA 94105-2126  
Telephone: (415) 227-0900  
Facsimile: (415) 227-0770

Attorneys for Creditors, Oracle USA, Inc.  
and Oracle Credit Corporation

**In re: General Motors  
Case No. 09-50026**

**CERTIFICATE OF SERVICE**

I am employed in the County of San Francisco, State of California. I am over the age of 18 and not a party to the within action. My business address is at Buchalter Nemer, A Professional Corporation, 333 Market Street, 25<sup>th</sup> Floor, San Francisco, California 94105-2126.

On June 18, 2009, I served the foregoing document described as:

**REQUEST FOR SPECIAL NOTICE PURSUANT TO BANKRUPTCY RULES 2002(a) AND (b)  
AND PLEADINGS PURSUANT TO BANKRUPTCY RULE 3017(a)**

on all other parties and/or their attorney(s) of record to this action by placing a true copy thereof in a sealed envelope or package as follows:

**Joseph R. Sgroi**  
Honigman Miller Schwartz and Cohn LLP  
2290 First National Building  
660 Woodward Avenue  
Detroit, MI 48226

**Brian Shoichi Masumoto**  
Office of the U.S. Trustee  
33 Whitehall Street, 21st. Floor  
New York, NY 10004

**Stephen Karotkin**  
Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153

**Tricia A. Sherick**  
Honigman Miller Schwartz and Cohn, LLP  
660 Woodward Avenue, Suite 2290  
Detroit, MI 48226

[ **XX** ] (BY MAIL) I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States mail at San Francisco, California. The envelope was sealed and placed for collection and mailing with first-class prepaid postage on that date following ordinary business practices.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on June 18, 2009, at San Francisco, California.

Hallina Pohyar

/s/ Hallina Pohyar